

# ASL SERVICES HOLDINGS, LLC.

3700 COMMERCE BOULEVARD  
KISSIMMEE, FLORIDA 34741

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Via Electronic Comment Filing Submission (ECFS)

PUBLIC COPY

June 28, 2013

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12<sup>th</sup> Street, S.W.

Washington, D.C. 20554

RE: ASL Services Holdings, LLC Annual Consumer Complaint Log Submission, Docket No.  
03-123

Dear Secretary Dortch:

Pursuant to the Federal Communications Commission's ("Commission") 47 C.F.R. §64.604(c)(1)(i) and (ii), ASL Services Holdings, LLC ("ASL/Global VRS" formerly branded "Gracias VRS"), hereby submits the attached consumer Complaint Log submissions for the periods June 1, 2012 through May 31, 2013. Section 64.604(c)(1)(i) requires relay service providers, including providers of video relay services who have been granted certification as federal Telecommunications Relay Service Fund eligible providers such as ASL/Global VRS, *inter alia* to maintain a complaint log which at a minimum contains, "the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution." Further, the Commission has requested that reporting providers include "at a minimum, the total number of interstate relay calls by type of TRS" for the review period.

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During the June 1, 2012 through May 31, 2013 reporting period, ASL/Global VRS processed **(CONFIDENTIAL)** calls. The Company experienced **(CONFIDENTIAL)**, a complaint to call ratio of less than **(CONFIDENTIAL)**.

ASL/Global VRS feels that user complaints remain an exceptionally helpful tool in the identification of operational issues. ASL/Global VRS has been able to resolve operational issues immediately in virtually all cases. Each complaint was resolved to the caller's satisfaction, where possible. Otherwise the caller was informed of the Company's practices or efforts to resolve the issue, where a resolution was required.

Pursuant to pursuant to 47 C.F.R. § 64.604(c)(2), ASL/Global VRS' contact person for VRS consumer information and complaints about intrastate service is:

**(CONFIDENTIAL)**

**Request for Confidential Treatment.** Request for Confidential Treatment. Pursuant to Section 0.459 of the Commission's rules, and "Exemption 4" of the Freedom of Information Act, ASL/Global VRS respectfully requests that the above information be deemed confidential and protected, accordingly. This information reveals the location of Company call centers that would be useful to competitors. Further, these Documents contain highly confidential information not intended for public consumption. ASL/Global VRS would not otherwise make these Documents publically available under any circumstance. Release of these Documents to the public could cause ASL/Global VRS irreparable and inestimable harm. ASL/Global VRS requests that the Documents be withheld from public inspection, accordingly. Should disclosure of the Documents be requested, ASL/Global VRS requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

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Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of the following reports required by the TRS rules, a confidential version, and separate public version are being submitted electronically to [TRSreports@fcc.gov](mailto:TRSreports@fcc.gov).

Thank you for your attention to this matter. Questions may be directed to Angela Roth.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jeremy M. Jack". The signature is fluid and cursive, with the first name "Jeremy" written in a larger, more prominent script than the last name "Jack".

Jeremy M. Jack

VP of VRS Operations

Attachment

cc: Greg Hlibok, Disability Rights Office, FCC (confidential version via electronic delivery)

<b><u>ASL Services Holdings, LLC 2012-2013 Customer Complaints</u></b>
<b>(CONFIDENTIAL)</b>